

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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ANDREW A. JOHNSON  
41 Windsor Pass  
Horsham, PA 19044,

Plaintiff,

-V.-

MONTGOMERY COUNTY COURT OF  
COMMON PLEAS,  
425 Swede Street  
Norristown, PA 19404,

Defendant.

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**CIVIL ACTION**

**No. 2:22-cv-00170**

**JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiff Andrew A. Johnson, by and through undersigned counsel, hereby brings this action against defendant Montgomery County Court of Common Pleas, and avers as follows:

**PARTIES**

1. Plaintiff Andrew A. Johnson (“Johnson”) is an adult individual residing at 41 Windsor Pass, Horsham, PA 19044.
2. Defendant Montgomery County Court of Common Pleas is a subdivision of the Commonwealth of Pennsylvania Unified Judicial System with its principal place of business located at 425 Swede Street, Norristown, PA 19404.

**ADMINISTRATIVE EXHAUSTION**

3. On March 7, 2019, Johnson filed a Charge of Discrimination with the U.S. Equal Employment Opportunity Commission.

4. On December 29, 2021, Johnson received his Notice of Right to Sue Letter from the United States Department of Justice.

### **JURISDICTION AND VENUE**

5. Jurisdiction exists in this matter pursuant to 28 U.S.C. §§1331 (Federal Question Jurisdiction).

6. Venue lies within this Judicial District pursuant to 42 U.S.C. §2000e-5(f)(3), the alleged unlawful employment practices having been committed in the Commonwealth of Pennsylvania.

### **FACTUAL BACKGROUND**

7. In 2010, Johnson was hired as a Court Crier in the Montgomery County Court of Common Pleas.

8. Throughout his employment, Johnson was a paid employee of the County of Montgomery.

9. Johnson was assigned to the Honorable Garrett D. Page, a Judge of the Montgomery County Court of Common Pleas.

10. At all times, Johnson performed his job duties in an excellent fashion.

11. In 2018, Johnson broke off a romantic relationship with Dianne DeSanto, a Court Reporter who also worked in Judge Page's Courtroom.

12. Sometime in late-November 2018, Ms. DeSanto falsely informed Judge Page and other members of his staff that Johnson had physically assaulted her.

13. Without conducting any investigation whatsoever and without giving Johnson any opportunity to refute Ms. DeSanto's false accusations, Judge Page immediately terminated Johnson's employment without notice or good cause on November 30, 2018.

14. At that time, Judge Page falsely claimed that Johnson had failed to meet performance standards and had violated the Code of Conduct for Employees of the Unified Judicial System.

15. Johnson had never been warned about an alleged failure to meet performance standards or alleged ethics violations, and these alleged issues were merely a pretext for firing Johnson.

16. If Johnson had been a woman, his employer would have conducted an investigation into the false allegations made by Ms. DeSanto and Johnson would not have been fired.

**COUNT I**  
**Title VII – Gender Discrimination**  
**42 U.S.C. §2000e *et seq.***

17. Johnson incorporates herein the previous averments as if fully set forth.

18. Johnson's employment was terminated on the basis of his gender (male) in violation of Title VII of the Civil Rights Act of 1964, as amended.

19. Defendant's conduct as aforesaid constitutes discrimination on the basis of sex in violation of Title VII of the Civil Rights Act of 1964, as amended.

20. As a result of said conduct, Johnson has suffered and will continue to suffer monetary damages, including lost wages and benefits.

21. As a result of said conduct, Johnson has been and will be required to expend monies for expenses.

22. As a result of said conduct, Johnson has suffered emotional distress, embarrassment, humiliation and damage to his reputation and earning capacity.

WHEREFORE, plaintiff Andrew A. Johnson demands judgment in his favor and against

defendant Montgomery County Court of Common Pleas for backpay, reinstatement or in the alternative front pay, compensatory damages, attorneys' fees, and costs of suit.

Date: January 14, 2022

/s/ Stanley B. Cheiken  
STANLEY B. CHEIKEN, ESQUIRE

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*Counsel for Plaintiff*